

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

CARMEN FIGUEROA, Petitioner)	CR No.: 04-10098-WGY
)	
)	
)	
)	
v.)	
)	
)	
)	
UNITED STATES OF AMERICA, Respondent)	
)	

MOTION TO EXTEND THE TIME TO FILE

NOW COMES, Counsel for the petitioner, Carmen Figueroa, in the above-captioned matter and moves for an additional thirty (30) days to be able to review and respond to the previously filed motion and opposition in regards to the petitioner's request for a sentence reduction due to the recently adjusted crack / cocaine sentencing guidelines.

IN SUPPORT, Counsel for the petitioner states as follows:

1. Counsel has just recently been re-assigned to represent the petitioner.
2. Counsel has been on trial before Judge Youngs for the past few weeks, United States v. Robert Luisi, Jr. and has not had ample time to review and respond to this documentation.

WHEREFORE, this Honorable Court should allow counsel an additional thirty (30) days to review and respond to these documents.

Respectfully submitted,
CARMEN FIGUEROA
By her Attorney;

Dated: March 5, 2008

/s/ John LaChance
John H. LaChance, Esquire
BBO# 282500
463 Worcester Road
Suite 203
Framingham, MA 01701
Tel: (508) 879-5730
Fax: (508) 879-2288

CERTIFICATE OF SERVICE

I, John H. LaChance, Esq., do hereby certify that I have served a copy of the same upon the government by electronically filing the same by means of the CM/ECF system upon Assistant United States Attorney Susan Postswillo located at the Office of the United States Attorney, United States District Courthouse, One Courthouse Way, Suite 9200, Boston, MA 02110 on this 5th day of March 2008.

/s/ John LaChance
John LaChance, Esquire